

Exhibit 14

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Hearing Date: July 30, 2014
Hearing Time: 10:00A.M

**RESPONSE TO OBJECTION
TO CLAIM NO. 392**

In Re:

Case No.: 12-12020

RESIDENTIAL CAPITAL, LLC, et al.

(Chapter 11)

Debtors

Assigned to:
Hon. Martin Glenn
Bankruptcy Judge

**DECLARATION OF COUNSEL PHILLIP ROBINSON IN RESPONSE AND
OPPOSITION TO THE OBJECTION TO RESCAP
BORROWER CLAIMS TRUST TO
CLAIM NUMBER 392**


I, Phillip Robinson, declare as follows:

1. I was admitted to this Court on a *Pro Hoc Vice* basis as counsel for Creditor Kevin J. Matthews. Doc. 1288.
2. I have represented Mr. Matthews since May 2010.
3. Originally I represented Mr. Matthews while Executive Director of Civil Justice Inc.—a Maryland non-profit legal services agency which concentrated its limited practice areas in the areas of consumer protection related to real estate, foreclosure, and debt collection practices. Peter Holland at the University of Maryland School of Law Consumer Protection Clinic acted as my co-counsel in the First Foreclosure action authorized and filed by GMAC Mortgage, LLC's authorized agents in the Circuit Court for Baltimore City, Maryland and we jointly aided Mr. Matthews for a period of time after the foreclosure case was

dismissed, at GMAC's request, through December 2011. Throughout this period of time, Mr. Matthews incurred over 180 hours of compensable time by both counsel and para professionals at Civil Justice and the Consumer Protection Clinic. The value of this time exceeds \$100,000 and can be itemized at the appropriate time during discovery or at an evidentiary hearing.

4. Beginning in February 2012 through the present I have continued to represent Mr. Matthews in my private law practice first at the Legg Law Firm LLC and now at the Consumer Law Center LLC. In this phase I have represented Mr. Matthews in this Court and in the Circuit Court for Baltimore City, Maryland in the Second Foreclosure action initiated by GMAC's authorized and appointed agents. Throughout this period of time, Mr. Matthews incurred over 250 hours of compensable time on his behalf by both counsel and paraprofessionals at the Legg Law Firm LLC and the Consumer Protection Clinic. The value of this time to date exceeds \$175,000 (and is on-going) and can be itemized at the appropriate time during discovery or at an evidentiary hearing.
5. To aid the ultimate fact-finder, whomever that may be, in determining the value of Mr. Matthews' claims against GMAC, attached to Mr. Matthews' opposition to the Debtors' Objection to his Proof of Claim attached hereto as **Exhibit 12**, is a summary of other similar judgments and verdicts which in my experience involve factual situations like to those experienced by Mr. Matthews.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July
3, 2014.



Phillip Robinson